REMARKS

Claims 5 and 7 have been amended to correct informalities. No new matter has been added.

Claims 5 to 8 are now pending in the present application. Applicants respectfully request continued examination of the present application in view of Applicants' RCE submission. For the convenience of the Patent Office, Applicants' response to earlier rejections concerning the claims has been provided below.

35 U.S.C. § 102(e) – Bencheck reference

In an earlier Office Action, claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,072,777 to Bencheck et al. ("Bencheck reference").

As stated in Applicants' previous response, claim 1 of the present invention was canceled in an earlier submission. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claim 1.

35 U.S.C. § 103(a) – Bencheck and Dahod references

In an earlier Office Action, claims 6 to 8 were rejected under 35 U.S.C. § 103(a) over the Bencheck reference in view of U.S. Patent No. 5,682,383 to Dahod et al. ("Dahod reference").

The Bencheck reference purportedly concerns a system and method for determining a root cause of error activity in a network, the root cause analysis operating on problem alert signals (PASs) generated by monitoring points in the network such as a threshold crossing alert PAS. Col. 3, lines 11-18. In Fig. 1, cited by the Office Action, the Bencheck reference purportedly concerns a network management system 100 having five layers, one of those layers being a network element layer (a physical layer) having various network elements used in the transport and routing of network traffic. The Bencheck reference recites that each network element 151 – 156 in the physical layer 150 can be designed to provide performance monitoring, alarm and status information to the higher layers in a network management system 100.

The Dahod reference refers to an arrangement for interconnecting groups of users into collision domains in a Local Area Network such as an Ethernet involving a plurality of repeater groups, with each repeater group being connected to a group of user stations. Abstract, lines 1-4. The Dahod reference further refers to the arrangement involving an electronically reconfigurable switch matrix, the switch matrix having a plurality of segment lines (or other transmission media), each of which is used to form one collision domain or Ethernet segment.

In contrast, claim 6 of the present invention (which depends from claim 5) concerns a device requiring that *the at least one domain manager has access to a selected network*

management device; that the at least one service management device is selected, and *the at least one domain manager is linkable to the selected at least one service management device*; and that *the at least one network management device is assigned to each network of the plurality of networks and the at least one network management device being controllable by the at least one service management device*. Claim 6 further requires *a controllable matrix to link the at least one service management device to the at least one domain manager*. The Bencheck and Dahod references do not render obvious claim 6 or the other dependent claims. The Bencheck reference, as recited in its Specification and at Fig. 1 shows a corporate policy layer, a lower business management layer 120, a lower network management layer 130, a lower element manager layer 140, and a lower network element layer 150, and then delves into observing root cause analysis. The Dahod reference, in combination with the Bencheck reference, also does not teach or describe certain various features of the claims of the present invention, including that *the at least one domain manager has access to a selected network management device*; that the at least one service management device is selected, and *the at least one domain manager is linkable to the selected at least one service management device*; that *the at least one network management device is assigned to each network of the plurality of networks and the at least one network management device being controllable by the at least one service management device*, and that *a controllable matrix to link the at least one service management device to the at least one domain manager*, as in claim 6 (and thus claims 7 and 8 which depend therefrom). Accordingly, Applicants respectfully submit that claims 6 to 8 are allowable, and respectfully request withdrawal of the rejection under 35 U.S.C. § 103(a) of those claims. Applicants note that claim 5 was neither expressly rejected nor accepted by the Office Action. However, in light of the above remarks, Applicants respectfully submit that claim 5 is also allowable over the cited art.

In summary, Applicants respectfully submit that all of claims 5 to 8 of the present application are allowable for the foregoing reasons.

CONCLUSION

In view of all of the above, it is believed that any previously presented rejections of the claims have been overcome. Accordingly, it is respectfully submitted that all claims 5 to 8, as amended, are allowable. It is therefore respectfully requested that the rejections under 35 U.S.C. §§ 102(e) and 103(a) be reconsidered and withdrawn, and that the present application issue as early as possible.

Respectfully submitted,

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